

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

VENTURA CONTENT, AVV,

Plaintiff,

v.

RYAN MILNES and A.F.I.C. INC.

Defendants.

Civil Action No. 10-9572 (RMB)

~~PROPOSED~~ CONSENT
JUDGMENT AND PERMANENT
INJUNCTION

USDC SDNY

DOCUMENT

ELECTRONICALLY FILED

DOC #: _____

DATE FILED: 3/23/11

Without admitting liability or conceding the validity of any claims or defenses in this action, Plaintiff and Defendants hereby stipulate, and move that this Court should enter a Judgment and Permanent Injunction in favor of Plaintiff and against Defendants, as follows:

1. Defendants acknowledge that they have been properly and validly served with the Summons and Complaint in this action. Defendants further consent to continuing jurisdiction of the Court for purposes of enforcement of the Judgment and Permanent Injunction, and irrevocably and fully waive and relinquish any argument that venue or jurisdiction by this Court is improper or inconvenient.
2. Defendants, and their respective officers, agents, servants, employees, parents, subsidiaries, shareholders, officers, principals, successors, assigns, licensees, transferees and all those acting in active concert or participation with them, shall be permanently enjoined from directly or secondarily infringing any copyrighted work owned by Plaintiff (the "Copyrighted Works"), including but not limited to, by: (i) copying, downloading, distributing, hosting, streaming, uploading, linking to, transmitting, or publicly performing any of Plaintiff's Copyrighted Works; (ii) enabling or inducing any person or entity to copy, download, distribute, upload, transmit, link to or publically perform any of Plaintiff's Copyrighted Works via the websites at the domain www.slutload.com or any other websites or online services owned or operated by or on behalf of Defendants. This injunction shall not apply to any of the Copyrighted Works for which the Defendants

have obtained a valid written license from the Plaintiff. As used herein, the term "Copyrighted Works" shall include any works, whether now in existence or later created, in which the Plaintiff (and any parents, subsidiaries, or affiliates of the Plaintiff) own or control an exclusive right to reproduce, distribute, transmit, display or perform.

3. The undersigned counsel represent that they have been authorized to execute this Stipulation And [Proposed] Judgment And Permanent Injunction on behalf of their respective clients.

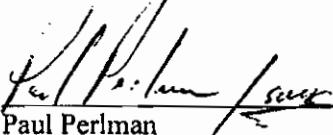
DATED: March 22, 2011



Gianni P. Servodidio

JENNER & BLOCK LLP
919 Third Ave, 37th Floor
New York, NY 10022
(212) 891-1600

On Behalf of Plaintiff



Paul Perlman

HODGSON RUSS LLP
140 Pearl Street, Suite 100
Buffalo, NY 14202 (716) 856-4000
On Behalf of Defendants

JUDGMENT AND PERMANENT INJUNCTION

Having duly considered the Stipulation of the Parties, and the proceedings in this Action, the Court orders that the Judgment And Permanent Injunction above shall be entered as the final judgment of this Court.

The Clerk of Court is respectfully requested to close this case.

SO ORDERED, this 23rd day of March, 2011.



Honorable Richard M. Berman
United States District Judge